

**ROCKY FLATS/ALBUQUERQUE PRODUCTION DIVISION REVIEW OF
ROCKY FLATS' RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY, COLORADO
DEPARTMENT OF HEALTH, AND DEPARTMENT OF ENERGY COMMENTS ON
THE FINAL PHASE IRCRA FACILITY INVESTIGATION/REMEDIAL INVESTIGATION WORK PLAN FOR
OPERABLE UNIT NO. 9 (ORIGINAL PROCESS WASTE LINES) ROCKY FLATS PLANT**

GENERAL COMMENTS:

1. A concern expressed repeatedly on Rocky Flats Plant (RFP) Operable Units (OUs) Work Plans is that the plans do not incorporate the sampling efforts of other OUs. In this review a comment is made in this area (specific comment 9, page (p.) 26). The response to this comment was "The OU-9 Field Sampling Plan (FSP) is consistent with the current approach of preparing FSPs independently for RFP OUs without considering integrations with other OUs." This statement verifies that the management philosophy is not to integrate the sampling plans of the operable units. Failure to integrate the sampling plans will result in the collection of redundant data. The lack of an integrated sampling plan also suggests that data will not be shared between the various operable units, potentially resulting in additional investigations that are unnecessary. Because of the relatively small size of the RF area, and the fact that most of the sixteen operable units overlap geographically, an integrated approach is a necessity to control costs. This concern should be addressed at the Program Management level, as individual authors should not modify the management approach without guidance to do so.
2. A response made repeatedly to the specific comments of the environmental evaluation is "Comment noted, but text was not modified due to time frame," or "due to extensive revisions suggested." The appropriateness of this response is questionable and should be reconsidered. Many of the comments refer to the lack of specifics regarding
 - contaminants of concern
 - availability of information
 - type of data to be collected, and
 - use of the data after collection

These specifics should be provided in the work plan. (Note that all comments on the Environmental/Evaluation (EE) may be moot. Colorado Department of Health comment and response Colorado Department of Health (CDH)-G2, p. 1 indicates that an entirely new EE for OU9 is to be developed.) Considering the extensiveness of comments made on the original EE, Department of Energy-Headquarters (DOE-HQ) should insist on peer review of the reworked EE work plan prior to submittal to Environmental Protection Agency and CDH.

SPECIFIC COMMENTS:

1. Response to Comment EPA-G1, p. 14: The response states that "The scope and extent of Stage 1 field activities, particularly the Stage 1 pipeline investigation, depend almost entirely upon the result of the additional data compilation." This statement indicates that this work plan is insufficient and that an extensive workplan addendum will be necessary.
2. Comments and responses, EPA-G3, EPA-S5, EPA S11, p. 14, 19, and 21. EPA commented on the exclusions of polychlorinated biphenyls (PCBs) and pesticides from the analytical parameters for this investigation. Comment S5 specifically references Table 2.6, which suggests that PCBs were discharged into the pipeline system. This comment also uses the words "must include for analysis." EPA has a point here. Limited sampling of PCBs/pesticides, only in the line associated with PCBs, may be sufficient to address this concern.
3. Response to Comment EPA-S7, p. 19: It is, for instance, unclear why the response goes on to list more contaminants identified as potentially being dispersed through the OPWL. EPA is asking for a justification as to why contaminants listed as "potentially occurring" were deleted from the Phase I investigation.

ANALYSIS OF INCORPORATION OF COMMENTS:

Comments were evaluated on the basis of the response provided. Where the response indicated that the comment would be incorporated into the text, the assumption was made that the response was correct and the text was modified. Where the response indicated a disagreement, a judgement was made as to effectiveness at the response in clarifying the authors position.

Colorado Department of Health

| Total Comments | Incorporated | Addressed | Partially Addressed | Not Addressed |
|----------------|--------------|-----------|---------------------|---------------|
| 35 | 32 | 3 | 0 | 0 |

Environmental Protection Agency Comments

| Total Comments | Incorporated | Addressed | Partially Addressed | Not Addressed |
|----------------|--------------|-----------|---------------------|---------------|
| 26 | 14 | 0 | 3 | 9 |

DOE Comments on OU9 Work Plan

| Total Comments | Incorporated | Addressed | Partially Addressed | Not addressed |
|----------------|--------------|-----------|---------------------|---------------|
| 285 | 134 | 10 | 17 | 124 |